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4 Hon. James L. Robart
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7 RICHARD J. FULTON,
8 Plaintiff,
9 vs.
10 LIVINGSTON FINANCIAL, LLC, and
11 NELSON & KENNARD,
12 Defendants.

13 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE
14 No. 15-00574
15 ROBERT SHANNON AFFIDAVIT
16

17 **AFFIDAVIT OF COMPLIANCE**
18

19 I, Robert Shannon, being duly sworn, state as follows:
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21 1. I am personally familiar with the matters set forth in this Affidavit and am
22 competent to testify to the matters stated herein.

23 2. I am the Managing Partner of Hinshaw & Culbertson, LLP ("the Firm"). John
24 P. Ryan has been a Partner at the Firm since 2013.

25 3. This Affidavit is respectfully submitted as proof of compliance with and
26 satisfaction of the sanctions and conditions imposed by the Court.

27 4. By Order entered on April 5, 2016, the Court imposed sanctions on Mr. Ryan
28 requiring that:

29 ROBERT SHANNON AFFIDAVIT

30 HINSHAW & CULBERTSON LLP
31 222 NORTH LASALLE STREET
32 SUITE 300
33 CHICAGO, IL 60601-1081
34 Main: 312-704-3000
35 Fax: 312-704-3001

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2 a. Mr. Ryan shall provide copies of Defendants' Reply on Motion to
3 Compel or Exclude ("Reply Brief") (Dkt. #30) to the Firm's Chairman, Kevin J. Burke;
4 the Firm's Executive Managing Director, Paul Boken; and myself; and

5 b. Defendants' counsel shall pay Plaintiff's counsel reasonable fees and
6 costs incurred in opposing Defendants' Motion to Compel.

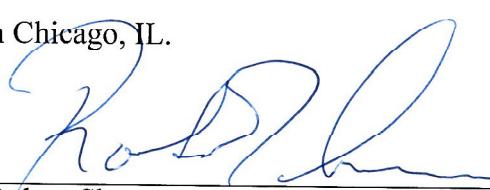
7 5. In satisfaction of the sanctions imposed, I have read: (1) the Court's orders of
8 April 5, 2016 and July 25, 2016; and (2) the complete briefing on Defendants' Motion to
9 Compel or Exclude (including the Reply Brief).

10 6. As a Firm, we hold ourselves to the highest standards of ethics and professional
11 competence. I execute this affidavit to not only comply with the Order requiring its filing, but
12 to also assure this Court that all aspects of this Court's purpose and objectives are understood
13 and accepted.

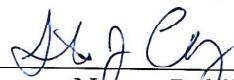
14 7. With this affidavit, I respectfully request that the Court find that Mr. Ryan has
15 satisfied this portion of the sanction that required my notification of this occurrence.

16 I certify under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct, to the best of my knowledge.

18 Executed this 4th day of August, 2016 in Chicago, IL.

19
20 By: 
Robert Shannon

21
22 SUBSCRIBED AND SWORN TO
23 before me this 4th day of August, 2016.

24 
25 Notary Public

ROBERT SHANNON AFFIDAVIT



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